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United States Attorney
District of Nevada

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Attorneys for the United States.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED SERVICES AUTOMOBILE)
ASSOCIATION, as subrogee of Brian Kilgore,)
Plaintiff,)
v.)
JASON DALE SHIPP; UNITED STATES OF)
AMERICA, *ex rel.* Department of the Army;)
and DOES I through X, inclusive,)
Defendants.)

Case No. 2:14-cv-00403-GMN-NJK

Order

As amended, page 2.

UNOPPOSED MOTION TO STAY PROCEEDINGS PENDING COMPROMISE SETTLEMENT

The United States of America respectfully requests this Court enter a ninety (90) day stay of all proceedings and deadlines, including all motion and discovery deadlines, in order to allow the parties to complete the terms of a settlement agreement; allow for the exchange of payment pursuant to the settlement agreement; and thereafter to execute and enter a Stipulation to Dismiss.

In support of this motion the United States submits as follows:

1. On February 20, 2014, Plaintiff filed a complaint in Justice Court, Clark County, Nevada, which was removed to Federal District Court by the United States on March 18, 2014. The Court

1 granted the United States' motion to extend time to answer until August 25, 2014, in order for parties to
2 continue with discussions and to finalize a pending settlement agreement.

3 2. On August 20, 2014, the parties agreed to and signed a compromise settlement which will
4 resolve all outstanding claims between the parties.

5 3. Plaintiff's attorney does not object to the requested stay of ninety (90) days.

6 4. The motion to stay is reasonable, made in good faith, and not made for purposes of delay.
7 Granting this stay will permit the parties time to finalize the settlement agreement process which will
8 result in a full dismissal of this action.

9 WHEREFORE, for the above reasons, the United States respectfully requests the instant Motion
10 to Stay Proceedings for ninety (90) days be granted, until November 24, 2014.

11 Respectfully submitted this 25th day of August 2014.

12 In the event that the parties have not
13 stipulated to dismiss the action by
14 November 24, 2014, they shall submit
15 a joint status report, no later than
December 1, 2014.

DANIEL G. BOGDEN
United States Attorney

/s/ Troy K. Flake
TROY K. FLAKE
Assistant United States Attorney

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21 IT IS SO ORDERED:

22 
~~UNITED STATES DISTRICT JUDGE~~
UNITED STATES MAGISTRATE JUDGE

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24 DATED: August 26, 2014
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PROOF OF SERVICE

I, Troy K. Flake, certify that the following individuals were served with the **UNOPPOSED MOTION TO STAY PROCEEDINGS PENDING COMPROMISE SETTLEMENT** on the following date and by the below identified method of service:

Electronic Case Filing:

Lisa A Taylor
5664 N. Rainbow Blvd.
Las Vegas, Nevada 89130
lisa@ltaylorlaw.com

Attorney for Plaintiffs

Dated this 25th day of August 2014.

/s/ Troy K. Flake
TROY K. FLAKE
Assistant United States Attorney